

Kent Ries
State Bar No. 16914050
2700 S. Western St., Suite 300
Amarillo, Texas 79109
(806) 242-7437
(806) 242-7440 – Fax
kent@kentries.com

COUNSEL FOR TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE:

MICHAEL STEPHEN GALMOR,

Debtor.

And

**GALMOR'S/G&G STEAM SERVICE,
INC.,**

Debtor.

KENT RIES, TRUSTEE,

Plaintiff,

v.

**GALMOR FAMILY LIMITED
PARTNERSHIP and GALMOR
MANAGEMENT, L.L.C.,**

Defendants.

CASE NO. 18-20209-RLJ-7

CASE NO. 18-20210-RLJ-7

ADVERSARY NO. 20-2003

**APPLICATION FOR APPROVAL OF EMPLOYMENT OF
KELLYE FUCHS AS A LITIGATION CONSULTANT**

TO THE HONORABLE ROBERT L. JONES, BANKRUPTCY JUDGE:

COMES NOW, Kent Ries, Trustee ("Trustee") of the referenced Chapter 7 bankruptcy estates and Plaintiff herein, and hereby files his Application for Approval of Employment of

Kellye Fuchs as a Litigation Consultant (the “Application”), and would show the Court the following:

1. Adversary Proceeding 20-2003 (the “Adversary”) was initiated on April 24, 2020 as a severed claim from Adversary Proceeding No. 19-2006.

2. The Trustee asserts it is necessary to employ Kellye Fuchs of PK & Company, PLLC, pursuant to 11 U.S.C. § 327(e), to review and potentially testify about historical accounting and related information regarding the bankruptcy Estates’ claims in the Adversary.

3. The Adversary involves claims against the Defendant entities for reimbursement of advances and expenses incurred by the two referenced bankruptcy Estates. The claims were scheduled by the Debtors in both cases and are being disputed by the Defendants in the Adversary.

4. The Trustee desires to hire Kellye Fuchs in the Adversary primarily to obtain her factual knowledge and accounting expertise regarding the issues that are the core issues in the Adversary. Kellye Fuchs is a Certified Public Accountant who previously performed services for both Debtors, and their related entities, including the adverse parties. Kellye Fuchs and her firm also have documents and knowledge of the relationship of the parties and their historical financial transactions that form the basis of the Adversary. Kellye Fuchs expertise as a Certified Public Accountant will assist the Trustee in the prosecution of the claims in the Adversary, including responding to the defenses raised by the Defendants.

5. The Trustee desires that he be authorized to employ Kellye Fuchs and to pay her such compensation and reimbursement of expenses as is just pursuant to 11 U.S.C. § 330 and Rule 2016 of the Federal Rules of Bankruptcy Procedure. Kellye Fuchs has substantial experience in the preparation of accounting records, financial statements and tax returns. Kellye

Fuchs' affidavit as required by 11 U.S.C. § 327 is attached hereto as Exhibit A and incorporated herein by reference for all purposes.

6. The hourly rate for legal services provided by Kellye Fuchs to the bankruptcy Estates will be \$275.00 per hour.

WHEREFORE, PREMISES CONSIDERED, Kent Ries, Trustee herein, respectfully prays for an Order of this Court approving the employment of Kellye Fuchs as a litigation consultant to perform professional services for the Trustee in the Adversary Proceeding, and for such other relief, at law or in equity, to which the Trustee may show himself justly entitled.

Respectfully submitted,

Kent Ries, Attorney at Law
2700 S. Western St., Suite 300
Amarillo, Texas 79109

By: /s/ Kent Ries 

Kent Ries
State Bar No. 1691450

COUNSEL FOR TRUSTEE

CERTIFICATE OF SERVICE

I certify that on the 6th day of August, 2021, a true and correct copy of the foregoing Application was sent either electronically via ECF or mailed in the United States mail, postage prepaid, to the parties listed below and on the attached mailing matrix.

Kellye Fuchs
P K & Company, PLLC
1000 N Main St
Elk City, Oklahoma, 73644
pkcompany@pk-cpa.com
Phone: (580) 225-8877


/s/ Kent Ries

Kent Ries

STATE OF TEXAS

COUNTY OF POTTER

§
§
§

KNOW ALL MEN BY THESE PRESENTS:

AFFIDAVIT OF KELLYE FUCHS

BEFORE ME, the undersigned authority, on this day personally appeared Kellye Fuchs, Elk City, Oklahoma, being by me duly sworn, upon oath deposed and said:

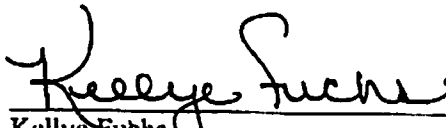
1. I am a resident of Elk City, ^{Beckham} County, Oklahoma; am over the age of 21 years and am of sound mind and have never been convicted of an offense.

2. I am Certified Public Accountant licensed to practice in the State of Oklahoma, and possess all of the qualifications of a Certified Public Accountant in the State of Oklahoma.

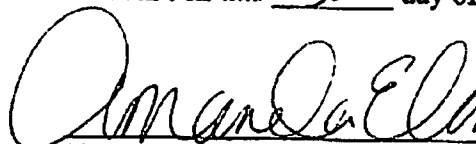
3. I have reviewed the *Application* by the Trustee for approval to retain Kellye Fuchs a litigation consultant. I have extensive knowledge and experience in accounting practices and procedures and am in all respects qualified to render the necessary consulting services requested by the Trustee.

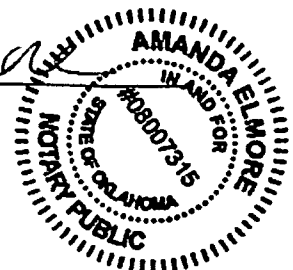
4. Kellye Fuchs and her accounting firm, P K & Company, PLLC, have previously represented Michael Stephen Galmor, Galmor's/G&G Steam Service, Inc, and Galmor Family Limited Partnership and Galmor Management, L.L.C. in preparing tax returns and financial statements. Other than this representation, I have no connection with any creditors of the estates, any party in the United States Trustee's office or any other parties which have interests adverse to the Bankruptcy Estates.

FURTHER AFFIANT SAITH NOT.


Kellye Fuchs

SWORN TO AND SUBSCRIBED BEFORE ME this 30th day of July, 2021.


Notary Public, State of Oklahoma



205 East Fifth Street, Room 201D
Amarillo, TX 79101-1559

A Rental Company
4901 E Main Street
Weatherford, OK 73096-9548

Advanced Water Solutions
1509 S Van Buren St.
Enid, OK 73703-7857

AEG Petroleum LLC
P.O. Box 1003
Amarillo, TX 79105-1003

Air Gas
P.O. Box 676015
Dallas, TX 75267-6015

AIRGAS USA LLC
110 West 7th St.
Suite 1400
Tulsa, OK 74119-1077

Albert Brothers
115 6th St.
Elk City, OK 73644-5760

Ally Financial
P.O. Box 9001948
Louisville, KY 40290-1948

American Express
P.O. Box 650448
Dallas, TX 75265-0448

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern, PA 19355-0701

Apex Remington, Inc.
13505 E 61st Street
Suite A
Broken Arrow, OK 74012-1295

Assiter & Associates, LLC
16650 Interstate 27
Canyon, TX 79015-6157

AT&T
P.O. Box 105414
Atlanta, GA 30348-5414

Bank Of America
P.O. Box 15710
Wilmington, DE 19886-5710

Barber & Bartz
525 South Main Street, Suite 800
Tulsa, OK 74103-4511

Barber Dyson Ford
P.O. Box 743
Elk City, OK 73648-0743

Beaver Express Services, LLC
PO Box 1168
Woodward, OK 73802-1168

Beckham County Treasurer
P.O. Box 600
Sayre, OK 73662-0600

Camrock Quality
P.O. Box 2407
Elk City, OK 73648-2407

Canyon Oilfield Services
11552 S Hwy 6
Elk City, OK 73644-9722

Caterpillar Financial Services
Corporation
Derryberry & Naifeh, LLP
4800 N. Lincoln Blvd.
Oklahoma City, OK 73105-3321

Centergas Fuels, Inc.
P.O. Box 2603
Pampa, TX 79066-2603

Chase
P.O. Box 94014
Palatine, IL 60094-4014

Cintas Corporation
P.O. Box 631025
Cincinnati, OH 45263-1025

CMI Drug Testing
6704 Guada Coma
Shertz, TX 78154-3247

CMT Engineering Inc.
P.O. Box 1786
Dripping Springs, TX 78620-1786

Comptroller of Public Accounts
c/o Office of the Attorney General
Bankruptcy - Collections Division
MC-008
Austin, TX 78711-2548

Crossroads
1627 North Main St.
Shamrock, TX 79079-1600

Culligan Water Conditioning
P.O. Box 1597
Pampa, TX 79066-1597

Culver Electric LLC
P.O. Box 427
Elk City, OK 73648-0427

David W. Bank, M.D.
P.O. Box 528
Elk City, OK 73648-0528

Dennis J. Hefley
15400 County Road EE
Briscoe, TX 79011-3231

Dickey Oilfield Sales Company
2211 Hwy 79 South
Wichita Falls, TX 76310-7962

Distribution Now
P.O. Box 200822
Dallas, TX 75320-0822

DJ's Rental
911 South Main Street
Elk City, OK 73644-6707

DNOW LP
7402 N. Eldridge Pkwy
Houston, TX 77041-1902

Dolese Bros. Co.
P.O. Box 960144
Oklahoma City, OK 73196-0144

Double H Oil Tools, Inc.
P.O. Box 2473
Pampa, TX 79066-2473

Doug Gray Ford, Inc.
P.O. Box 485
Sayre, OK 73662-0485

Enterprise
P.O. Box 800089
Kansas City, MO 64180-0089

Floyd CAD
c/o Tara LeDay
P.O. Box 1269
Round Rock, TX 78680-1269

Floyd County Appraisal District
P.O. Box 249
Floydada, TX 79235-0249

Galmor FLP
6994 US HWY 83
Shamrock, TX 79079-4129

Galmor's/G&G Steam Service, Inc.
P.O. Box 349
Shamrock, TX 79079-0349

GR Energy Services
2150 Town Square Place
Suite 410
Sugar Land, TX 77479-1465

Great Plains Bank
c/o Mullin Hoard & Brown, LLP
P.O. Box 31656
Amarillo, TX 79120-1656

Great Plains Pest Control
P.O. Box 192
Lefors, TX 79054-0192

H.J. Garrison Oil Company
P.O. Box 231
Shamrock, TX 79079-0231

Happy State Bank & Trust Co.
Co. C. Jared Knight
701 S Taylor Suite 324
Amarillo, TX 79101-2417

Harbison Fischer Manufacturing
P.O. Box 731403
Dallas, TX 75373-1403

Harbison Fischer Manufacturing
Company
901 N. Crowley Rd.
Crowley, TX 76036-3798

Innovative Technology
P.O. Box 726
Elk City, OK 73648-0726

Interbank
P.O. Box 1049
Elk City, OK 73648-1049

INTERNAL REVENUE SERVICE
1100 COMMERCE ST.
DALLAS, TX 75242

INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA, PA 19101-7346

IPFS Corporation
30 Montgomery Street
Suite 501
Jersey City, NJ 07302-3821

IPFS Corporation
P.O. Box 730223
Dallas, TX 75373-0223

IPFS CORPORATION
30 MONTGOMERY STREET
SUITE 1000
JERSEY CITY, NJ 07302-3836

IRS
P.O. Box 802501
Cincinnati, OH 45280-2501

Janning Welding
918 N. Van Buren
Elk City, OK 73644-2916

Jerome S. Sepkowitz
Derryberry & Naifeh, LLP
4800 N. Lincoln Blvd.
Oklahoma City, OK 73105-3321

Jerry D. McLaughlin
P.O. Box 9375
Amarillo, TX 79105-9375

John Deere Financial
P.O. Box 650215
Dallas, TX 75265-0215

Jones Passodelis
Gulf Tower-Suite 3410
707 Grant Street
Pittsburgh, PA 15219-1908

JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE, LA 71203-4774

JWD International Marketing, Inc.
P.O. Box 1000
Skiatook, OK 74070-5000

Kent David Ries
2700 S. Western Street
Suite 300
Amarillo, TX 79109-1536

Kirby-Smith Machinery, Inc.
c/o Hicks Law Group PLLC
325 N. St. Paul Street, Suite 4400
Dallas, TX 75201-3880

KJC Fire Safety Solutions
805 Shore Dr.
Elk City, OK 73644-2635

Kubota Credit
P.O. Box 0559
Carol Stream, IL 60132-0559

Lease Consultants Corporation
P.O. Box 71397
Des Moines, IA 50325-0397

Leslie Pritchard
Attn. Collin J. Wynne
1001 S. Harrison, Suite 200
Amarillo, TX 79101

Lindley Equipment
P.O. Box 457
Cordell, OK 73632-0457

Lovelady, Christy & Associates
801 S. Fillmore, Ste. 420
Amarillo, TX 79101-3520

M.B. McKee Co., Inc.
2205 Avenue E
Lubbock, TX 79404-1032

Marshall Discount Auto
P.O. Box 451
Wheeler, TX 79096-0451

Martins Air Conditioning
2116 W. 20th St.
Elk City, OK 73644-9206

McLemore Sand & Top Soil
11157 N. 1930 Road
Sayre, OK 73662-6040

Mine Safety & Health
Administration
P.O. Box 790390
St. Louis, MO 63179-0390

MPS Enterprise, Inc.
1205 S. Eastern Ave.
Elk City, OK 73644-3836

NAPA Auto Parts
716 West 3rd St.
Elk City, OK 73644-5208

NCW Insurance
P.O. Box 506
Amarillo, TX 79105-0506

Nesmith Propane
3502 West 3rd Street
Elk City, OK 73644-4335

Oklahoma Employment Security
Commission
PO Box 53039
Oklahoma City, OK 73152-3039

Oklahoma Employment Security
Commission
401 E Broadway St
Sand Springs, OK 74063-7965

Oklahoma Tax Commission
P.O. Box 26930
Oklahoma City, OK 73126-0930

Oklahoma Tax Commission
General Counsel's Office
100 N. Broadway Ave., Suite 1500
Oklahoma City, OK 73102-8601

P K & Company PLLC
P.O. Box 1728
Elk City, OK 73648-1728

Patrick Alan Swindell
Swindell Law Firm
1619 S. Kentucky St., Ste. B202
Amarillo, TX 79102-2276

PaveTex Engineering, LLC, dba
PaveTex
12804 County Road 2500
Lubbock, TX 79404-8329

PNC Equipment Finance, LLC
J. Eric Atherholt/Flamm Walton
Heimbach
794 Penlllyn Pike, Suite 100
Blue Bell, PA 19422-1669

Powerscreen Texas, Inc.
5680 W. State Swy 71,
Box 658
La Grange, TX 78945-0658

Quality Heating & Cooling
311 S Nebraska
Shamrock, TX 79079-2741

Quill Corporation
P.O. Box 37600
Philadelphia, PA 19101-0600

Ryan Construction
9500 County Road 270
Zephyr, TX 76890-3312

Safety-Kleen Systems, Inc.
P.O. Box 650509
Dallas, TX 75265-0509

Silver Arc Welding
P.O. Box 3366
Enid, OK 73702-3366

Skinner Bros. Company
P.O. Box 21228
Dept 9
Tulsa, OK 74121-1228

Steve's Diesel & Truck Service
P.O. Box 166
Elk City, OK 73648-0166

T&W Tire
P.O. Box 258859
Oklahoma City, OK 73125-8859

Teddy's Glass
515 N Van Buren
Elk City, OK 73644-4260

Texas Attorney General
P.O. Box 12548
Austin, TX 78711-2548

Texas Workforce Commission
Jason Starks, Asst. Attorney Gen.
c/o Sherri K. Simpson, Paralegal
Austin, TX 78711-2548

TEXAS WORKFORCE COMMISSION
REGULATORY INTEGRITY DIVISION -
SAU
101 EAST 15TH STREET, ROOM 556
AUSTIN, TX 78778-0001

Thru Tubing Solutions
8032 Main St
Houma, LA 70360-4428

Treasurer of Beckham County,
Oklahoma
P.O. Box 276
Cheyenne, OK 73628-0276

Triple D Services
203 N Houston
Shamrock, TX 79079-2319

Troy Jones Equipment
1203 S Main St
Elk City, OK 73644-6911

U.S. Attorney General
U.S. Department of Justice
10th & Pennsylvania Ave
Washington, DC 20530-0001

U.S. Attorney's Office
1205 Texas Ave. Room 700
Lubbock, TX 79401-4029

Unifirst Corp.
4210 S.E. 22nd Street
Amarillo, TX 79103-6204

United Healthcare
P.O. Box 94017
Palatine, IL 60094-4017

United Life Insurance Co.
P.O. Box 142153
Overland Park, KS 66225-5326

United Rentals
P.O. Box 840514
Dallas, TX 75284-0514

United Rentals
Attn: Mike Dowden
6125 Lakeview Road #300
Charlotte, NC 28269-2616

United States Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242-0996

UnitedHealthcare Insurance Company
ATTN: CDM - Bankruptcy
185 Asylum Street
Hartford, CT 06103-3408

Warren CAT
P.O. Box 842116
Dallas, TX 75284-2116

WB Supply
P.O. Box 206620
Dallas, TX 75320-6620

Weldon Parts
1100 S. Main St.
Elk City, OK 73644-6916

Wells Fargo Bank, N.A.
Small Business Lending Division
P.O. Box 29482
Phoenix, AZ 85038-9482

Wells Fargo Business Line
P.O. Box 51174
Los Angeles, CA 90051-5474

Wells Fargo Equipment Finance
NW 8178
P.O. Box 1450
Minneapolis, MN 55485-5934

Wells Fargo Equipment Finance
Mullin Hoard & Brown, LLP
P.O. Box 31656
Amarillo, TX 79120-1656

Wells Fargo Vendor Financial
Services, LLC
1010 Thomas Edison Blvd., SW
Cedar Rapids, IA 52404-8247

Western Equipment
404 Frisco Avenue
Clinton, OK 73601-3440

Wheeler County
c/o Perdue Brandon Fielder Collins
& Mot
PO Box 9132
Amarillo, TX 79105-9132

Xerox Corporation
P.O. Box 650361
Dallas, TX 75265-0361

Yow Automotive
221 S. Jefferson
Elk City, OK 73644-5737

Zee Medical
13 NW 132nd Street
Oklahoma City, OK 73114-2318

205 East Fifth Street, Room 201D
Amarillo, TX 79101-1559

AEG Petroleum LLC
P.O. Box 1003
Amarillo, TX 79105-1003

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern, PA 19355-0701

Assiter & Associates, LLC
16650 Interstate 27
Canyon, TX 79015-6157

Caterpillar Financial Services
Corp
2120 West End Avenue
Nashville, TN 37203-5341

Caterpillar Financial Services
Corporation
Derryberry & Naifeh, LLP
4800 N. Lincoln Blvd.
Oklahoma City, OK 73105-3321

Clay P. Booth
102 East Thatcher Street
Edmond, OK 73034-3662

Deere & Company and Deere Credit,
Inc.
6400 NW 86th Street
P.O. Box 6600
Johnston, IA 50131-6600

DEERE CREDIT SERVICES INC
ATTN LITIGATION & RECOVERY
DEPARTMENT
PO BOX 6600
JOHNSTON, IA 50131-6600

First State Bank of Mobeetie
c/o Reuben L. Hancock, P.C.
7480 Golden Pond Pl., Ste. 200
Amarillo, TX 79121-1964

First State Bank of Mobeetie
P.O. Box 8
Mobeetie, TX 79061-0008

First State Bank of Mobeetie
P.O. Box 3
Mobeetie, TX 79061-0003

Flamm Walton Heimbach Lamm, P.C.
Attn: Eric Atherholt
794 Penlllyn Pike, Ste. 100
Blue Bell, PA 19422-1669

Galmor Family Trust
P.O. Box 349
Shamrock, TX 79079-0349

Great Plains Bank
c/o Mullin Hoard & Brown, LLP
P.O. Box 31656
Amarillo, TX 79120-1656

Great Plains Bank
2017 W. Third
P O Box 488
Elk City, OK 73648-0488

Great Plains National Bank
P.O. Box 488
Elk City, OK 73648-0488

Hall Estill Hardwick Gable and
Nelson, P.C.
100 North Broadway, Suite 2900
Oklahoma City, OK 73102-8808

Happy State Bank
Co. C. Jared Knight
701 S. Taylor , Suite 324
Amarillo, TX 79101-2417

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Jerome S. Sepkowitz
Derryberry & Naifeh, LLP
4800 N. Lincoln Blvd.
Oklahoma City, OK 73105-3321

Jerry D. McLaughlin
P.O. Box 9375
Amarillo, TX 79105-9375

John Deere Financial
P.O. Box 650215
Dallas, TX 75265-0215

Kent David Ries
2700 S. Western Street
Suite 300
Amarillo, TX 79109-1536

Kirby Smith Machinery, Inc.
6715 West Reno Avenue
Oklahoma City, OK 73127-6590

Kirby-Smith Machinery, Inc.
c/o Hicks Law Group
325 N. St. Paul Street, Suite 4400
Dallas, TX 75201-3880

Kubota Credit Corporation
PO Box 9013
Addison, TX 75001-9013

Leslie Pritchard
Attn. Collin J. Wynne
1001 S. Harrison, Suite 200
Amarillo, TX 79101-3434

Lovelady, Christy & Associates
801 S. Fillmore, Ste. 420
Amarillo, TX 79101-3520

McWhorter Cobb & Johnson, LLP
1722 Broadway
Lubbock, TX 79401-3093

Melvin Gene Payne Estate
199 W. 2nd Street
Shamrock, TX 79079

Michael Stephen Galmor
P.O. Box 349
Shamrock, TX 79079-0349

Oklahoma Tax Commission
General Counsel's Office
100 N. Broadway Ave., Suite 1500
Oklahoma Tax Commission, OK 73102-8601

Oklahoma Tax Commission
2501 North Lincoln Blvd.
Oklahoma City, OK 73194

Patrick Alan Swindell
Swindell Law Firm
1619 S. Kentucky St., Ste. B202
Amarillo, TX 79102-2276

PNC Equipment Finance, LLC
J. Eric Atherholt/Flamm Walton
Heimbach
794 Penllyn Pike, Suite 100
Blue Bell, PA 19422-1669

PNC Financial, LLC
655 Business Center Dr., Ste. 250
Horsham, PA 19044-3448

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Sprouse Shrader Smith
P.O. Box 15008
Amarillo, TX 79105-5008

Stewart R. Werner
LAW OFFICES OF STEWART R. WERNER
801 S. Fillmore, Ste. 720
Amarillo, TX 79101-3545

Synchrony Bank
c/o PRA Receivables Management,
LLC
PO Box 41021
Norfolk, VA 23541-1021

Texas Attorney General
P.O. Box 12548
Austin, TX 78711-2548

U.S. Attorney General
U.S. Department of Justice
10th & Pennsylvania Ave
Washington, DC 20530-0001

U.S. Attorney's Office
1205 Texas Ave. Room 700
Lubbock, TX 79401-4029

Underwood Law
P.O. Box 9158
Amarillo, TX 79105-9158

United States Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242-0996

Wells Fargo Equipment Finance
600 South 4th St., MAC N9300-100
Minneapolis, MN 55415-1526

Wheeler County
c/o Perdue Brandon Fielder Collins
& Mot
PO Box 9132
Amarillo, TX 79105-9132

Wheeler County Tax Office
P.O. Box 1060
Wheeler, TX 79096-1060